

EXHIBIT A

PH WP Timeline

- August 2015 Baylor's Board of Regents hire Gina Maisto Smith and Leslie Gomez of Pepper Hamilton ("Pepper") to conduct investigation.
- May 26, 2016 Baylor Regents release the Findings of Fact.
- June 2016 Jane Does 1-6 file their Original Petition.
- September 26, 2016 Plaintiffs serve their first request for production for Pepper documents.
- February 6, 2017 Smith and Gomez leave Pepper and join Cozen O'Connor.
- March 24, 2017 Plaintiffs file Motion to Compel regarding Pepper documents. (Dkt. 93)
- August 21, 2017 Court issues Order finding waiver of the attorney-client privilege for communications with Pepper but not work product. (Dkt. 168)
- August 21, 2017 Jane Doe 11 files her Original Petition.
- February 2019 Consolidation of three Baylor Jane Doe lawsuits.
- June 2, 2020 Judge Austin grants Plaintiffs' Motion to Compel production of Pepper work product in all cases on basis of waiver. (Dkt. 845)
- June 16, 2020 Baylor files its appeal of Judge Austin's Order. (Dkt. 855)
- August 5, 2021 Court issues Order on Baylor's appeal, holding that Baylor waived work product protection for Pepper documents, but only in the *Jane Doe 11* case (the "Waiver Order"), and orders the parties to confer on the logistics of the production. (Dkt. 988)
- August 27, 2021 Parties file Joint Advisory, advising the Court of their agreements regarding production of the Pepper work product. (Dkt. 1001)
- October 20, 2021 The Fifth Circuit denies Baylor's Petition for Mandamus Relief.
- October 27, 2021 Baylor produces Pepper work product documents but withholds documents for which it is required to send FERPA notices. (Dkt. 987)
- Mid-January 2022 Baylor receives list from Court of students who filed FERPA objections.
- January 24, 2022 Baylor produces documents withheld for FERPA that were not subject to student objection.
- January 20-31, 2022 Court denies all pending FERPA objections. (Dkts. 1004-1022)
- February 3, 2022 Baylor produces all remaining documents withheld for FERPA objections.
- March 11, 2022 Parties meet in Waco to confer on the Pepper work product documents.
- March 24, 2022 Plaintiffs file their Motion to Compel, asking the Court to sanction Baylor and order Baylor to produce all withheld Pepper work product under a "clawback procedure." (Dkt. 1041)
- March 28, 2022 Baylor files its response to Plaintiffs' Motion, proposing the Court appoint a Special Master. (Dkt. 1044)
- April 8, 2022 UnitedLex completes its production of the Pepper work product.